

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALEXANDER ALHOVSKY,

Plaintiff,

**NOTICE OF MOTION
TO DISMISS**

-against-

07 CV 7628 (CM)(DFE)

THOMAS RYAN, NEW YORK CITY POLICE
DEPARTMENT DETECTIVES "1-5", NEW YORK
CITY POLICE DEPARTMENT OFFICERS "1-10",
JACK T. LINN, STEVE SIMON, RAY BROWN,
BARBARA BROWN, and the NEW YORK CITY
DEPARTMENT OF PARKS AND RECREATION,


Defendants.
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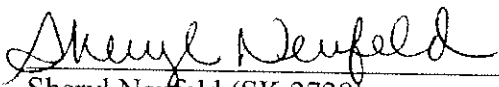
PLEASE TAKE NOTICE that, defendants Thomas Ryan, Jack T. Linn, Steve Simon, Ray Brown and the New York City Department of Parks and Recreation will move this Court before the Honorable Colleen McMahon, United States District Judge, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York at a date and time to be determined by the Court, for dismissal of the complaint with prejudice, pursuant to Rule 12(c) or, in the alternative, for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure and in accordance with Judge McMahon's individual practices, on the grounds that the individual defendants are entitled to qualified immunity on some or all of plaintiff's claims and that the Department of Parks and Recreation is entitled to judgment as a matter of law.

PLEASE TAKE FURTHER NOTICE that such motion will be submitted following the prescribed period of discovery set forth in the Court's Individual Practices.

Dated: New York, New York
November 13, 2007

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Corporation Counsel of the
City of New York
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Linn, Steve Simon, Ray Brown, and the New York
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